

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA FLORIDA**

UNITED STATES OF AMERICA

v.

Case No.8:03-CR-77-T-30TBM

HATEM NAJI FARIZ

/

**UNOPPOSED MOTION TO AMEND CONDITIONS OF RELEASE
TO ALLOW TRAVEL TO MIAMI, FLORIDA**

The Defendant, Hatem Naji Fariz, pursuant to 18 U.S.C. § 3142(c)(3), respectfully requests this Honorable Court to amend his conditions of release to allow him to travel to the area of Miami, Florida, during the pendency of this case. As grounds in support, Mr. Fariz states:

1. On April 23, 2003, Mr. Fariz was released on a substantial secured bond, which includes agreements to forfeit property. One of the conditions of Mr. Fariz's release is that he not travel outside the Middle District of Florida. The Court has previously modified the conditions of release to allow travel to the Chicago, Illinois and Austell, Georgia areas without requiring motions for each trip. (Doc. 333).

2. Mr. Fariz would like to be able to travel to and from the area of Miami, Florida from December 17, 2005, through December 20, 2005. Mr. Fariz makes this request so that he and his family may enjoy a brief vacation in the Miami area.

3. Mr. Fariz does not anticipate other trips to Miami during the remainder of this

case. Prior to departing from the Middle District of Florida, Mr. Fariz will confirm his travel plans and contact information with Nathan Dodson, Pretrial Services Officer. Mr. Fariz currently has reservations to stay at the Comfort Suites, located at 3901 SW 117th Avenue, Miami, Florida, 33715. Mr. Fariz can be contacted on his cell at (813) 355-6991 or at the aforementioned Comfort Suites; (305) 220-3901. Should this information change, Mr. Fariz will notify Mr. Dodson.

4. The Federal Public Defender's Office has spoken with Mr. Dodson, and he indicated that he does not have an objection to this request.

5. Assistant United States Attorney Walter Furr, III has been advised of this motion and has no objection.

MEMORANDUM

The Court may at any time amend an order of release to impose additional or different conditions of release. 18 U.S.C. § 3142(c)(3). Mr. Fariz respectfully requests that his conditions of pretrial release be amended to allow travel to and from the area of Miami, Florida from December 17, 2005, through December 20, 2005.

WHEREFORE, the defendant, Hatem Naji Fariz, moves this Honorable Court for an order modifying his conditions of release to allow him to travel to the area of Miami, Florida.

Respectfully submitted,

R. FLETCHER PEACOCK
FEDERAL PUBLIC DEFENDER

s/ Kevin T. Beck

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 8th day of December, 2005, a true and correct copy of the foregoing has been furnished by CM/ECF, to Walter Furr, Assistant United States Attorney; Terry Zitek, Assistant United States Attorney; Cherie L. Krigsman, Trial Attorney, U.S. Department of Justice, Alexis L. Collins, Assistant United States Attorney; William Moffitt and Linda Moreno, counsel for Sami Amin Al-Arian; Bruce Howie, counsel for Ghassan Ballut; and to Stephen N. Bernstein, counsel for Sameeh Hammoudeh.

s/ Kevin T. Beck

Kevin T. Beck
Assistant Federal Public Defender